

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

MELVIN INGRAM;
SHANTEL ADAMS;
DAVID BECK;
DWAYNE BOWENS;
ALFREDO CARDENAS;
VERONICA CLEAVES;
MARCUS COCHRAN;
ROBERT COLUCCI;
LESLIE CREWS;
ERIC FLAKE;

JACOB GREENWELL;
LAWONDA HODGES;
LAROME HUMPHREY;
ROBERT KATALTEPE;
JOHN LINTNER;
KEESHA MCCLINTON;
LAKISHA MCCOY;
CLIFTON MCCOY;
DEDRECK MCVAY;
HARRY OLIVER;

DARRELL ONSBY;
FREDERICK RAYFORD;
JOHN RILES;
ASHLEY ROBERTSON;
DEANDRE ROSSER;
DUSTIN RUSSELL;
PATRICK SHAW;
CEDRIC TAYLOR;
JESSE TOWNSEND; AND
STEVEN WESBY

Individually and as potential class
Representatives for all similarly
Situated claimants

PLAINTIFFS

VS.

BILL OLDHAM, in his individual capacity and in his official capacity as the Sheriff of Shelby County, Tennessee; **ROBERT MOORE**, in his individual capacity and in his official capacity as the Jail Director of the Shelby County, Tennessee; **CHARLENE MCGHEE**, in her individual capacity and in her official capacity as the Assistant Chief Jail Security of Shelby County, Tennessee; **DEBRA HAMMONS**, in her individual capacity and in her official capacity as the Assistant Chief of Jail Programs of Shelby County, Tennessee; **SHELBY COUNTY, TENNESSEE**, a Tennessee municipality; and **TYLER TECHNOLOGIES, INC.**, a foreign corporation, and other unknown and unnamed Individuals and Entities,

NO: 2:17-cv-02795 SHM

DEFENDANTS.

**MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT BY
DEFENDANT TYLER TECHNOLOGIES, INC.**

COMES NOW Defendant Tyler Technologies, Inc. (“Tyler”) and for its unopposed motion for extension of time to file its response to the Complaint, states as follows:

1. The Plaintiffs filed their complaint in the United States District Court for the Western District of Tennessee, Western Division on October 31, 2017. Tyler was served with the Complaint on November 16, 2017.

2. The deadline for responding to the Complaint is December 7, 2017.

3. In light of the Thanksgiving holiday and upcoming holidays, the parties have agreed that Tyler Technologies should have a 30 day extension to Monday, January 8, 2018 to file its response to the Complaint in this matter, subject to the Court’s approval of the same.

4. Counsel for the parties conferred and Plaintiffs do not object to this extension.

WHEREFORE, Defendant Tyler Technologies, respectfully moves this Court for an order extending its time to file a response to the Complaint herein to January 8, 2018.

Respectfully submitted,

s/ Bradley E. Trammell

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CERTIFICATE OF CONSULTATION

Brad Trammell, counsel for Defendants, consulted with Steve Wilson, one of Plaintiffs' counsel on November 29, 2017, and Plaintiffs' counsel informed Defendants' counsel that Plaintiffs have no objection to the requested extension of time.

s/ Bradley E. Trammell
Bradley E. Trammell

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on December 1, 2017, a true and correct copy of the foregoing document was forwarded by electronic means through the Court's ECF System and/or email to:

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s/ Bradley E. Trammell
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